

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**ABANTE ROOTER AND PLUMBING,  
INC.**, a California corporation, and **TERRY  
FABRICANT**, individually and on behalf  
of all others similarly situated,

*Plaintiffs,*

v.

**CREDITORS RELIEF LLC**, a New  
Jersey limited liability address,

*Defendant.*

CASE NO. 2:20-CV-03272-SDW-  
LDW

**NOTICE OF MOTION FOR  
LEAVE TO APPEAR PRO  
HAC VICE**

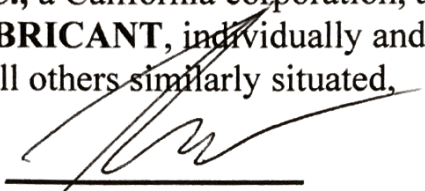
Plaintiffs Abante Rooter and Plumbing, Inc. and Terry Fabricant (“Plaintiffs”), by and through their undersigned counsel, hereby move pursuant to Local Rule 101.1(c) for an Order admitting Patrick H. Peluso and Taylor T. Smith of Woodrow & Peluso, LLC as *pro hac vice* counsel for Plaintiffs and the alleged class in the above-captioned case.

In support, the Declarations of Mr. Peluso and Mr. Smith are attached hereto as Exhibits A, and B. A certification from Jeffrey S. Arons is attached hereto as Ex. C. A proposed order is also attached hereto as Ex. D.

Dated: March 30, 2020

Respectfully submitted,

**ABANTE ROOTER AND PLUMBING  
INC.**, a California corporation, and **TERRY  
FABRICANT**, individually and on behalf  
of all others similarly situated,

By:   
Jeffrey Arons, Esq.  
One of Plaintiff's Attorneys

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*\*Pro Hac Vice* admission to be sought